



Privacy Impact Assessment
for the

Common Services for Borrowers (CSB)

Date
June 23, 2006

Contact Point
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1. What information will be collected for the system (Ex. Name, Social Security Number, annual income, etc)?

Common Services for Borrowers (CSB) is a consolidated system that supports Loan Consolidation (LC), Debt Management (DMCS), Direct Loan Servicing System (DLSS) and Conditional Disability Discharge Tracking System (CDDTS). These four legacy systems will eventually be discontinued and will be replaced by a single CSB solution that will incorporate and enhance the functionality of the existing systems.

The CSB System collects and maintains most information considered to be Privacy Act data (name, address, telephone numbers, e-mail address, bank account numbers, SSN, etc.). This information is collected and maintained for borrowers that receive a Direct Loan, a consolidation, or default on a student loan. In addition, demographic data is also being collected and maintained in the CSB System.

2. Why is this information being collected?

This information is collected to complete official Government business related to the administration of the CSB Program.

3. How will the information be used?

The CSB System supports a Program Office (PO) that assists borrowers with loan consolidation and disburses funds related to loan consolidation. It also has functionality wherein loan holders can verify, update data, and certify loans they hold before its consolidation. The CSB System database assists in the tracking of information pertinent to the borrower as well as information on the consolidation of loans.

Also, this information can be used to collect monies from a defaulted student loan, and to tracking borrowers that apply for Full and Permanent Disability.

4. Will this information be shared with any other agency? If so, with which agency or agencies?

Yes. This information will be shared with the following agencies and/or companies:

- Private Collection Agencies (PCAs)
- Guaranty Agencies (GA)
- National Credit Bureaus
- Department of Justice (DOJ)
- Internal Revenue Service (IRS)
- United States Treasury
- Schools
- Lenders
- United States Postal Service (USPS)
- Internal FSA Interfaces



- Common Origination and Disbursement (COD)
- National Student Loan Database (NSLDS)
- Financial Management Systems (FMS)
- Loan Consolidation (LC)

- Grants Administration and Payment System (GAPS)
- Postsecondary Education Participation System (PEPS)

5. Describe the notice or opportunities for consent that are provided to individuals about what information is collected and how that information is shared with others organizations. (e.g., posted Privacy Notice).

There are Privacy Act Notices on the CSB System and its legacy sites for both internal and external users, including public users. The following link is representative of the Privacy Act Notice:

https://dlswsprd.dlssonline.com/csbweb_borrower/privacyPolicy.do?FROM_DLSS=true

In addition, there is a Privacy Act Notice on the FFEL Mainframe and other CSB components.

6. How will the information be secured?

The information is secured following the guidance of OMB Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and Public Law 100-235, "Computer Security Act of 1987." In addition, CSB is currently re-writing the System Security Plan (SSP) that details the security requirements and describes the security controls that are in place to meet those requirements. A certification and accreditation process in accordance with the National Institute of Standards & Technology (NIST) "Guide for the Security Certification and Accreditation of Federal Information Systems" will validate our security controls.

7. Is a system of records being created or updated with the collection of this information?

A "System of Records" has been created for CSB. The "System of Records" is published in the Federal Register (Volume 71, Number 14/Monday, January 23, 2006/Notices). A copy of the document is attached with this Privacy Impact Assessment.